

## Attachment C

June 22, 2004

Mr. John Doe  
Village of Anywhere  
1234 Knox Road  
Anywhere, NE 69000

Re: Total Coliform Rule Violations – Village of Anywhere - NE3100000

Dear Mr. Doe:

The Nebraska Department of Health and Human Services Regulation and Licensure (HHS-R&L) has been reviewing Public Water System (PWS) records for coliform (bacteriological) positive water samples. The Village of Axtell has been identified as having experienced problems with positive bacteriological samples, and subsequent violations of the Total Coliform Rule. The record review looked at the most recent seven (7) years (1997 through 2003). HHS-R&L records indicate that your positive bacteriological samples have all occurred in the same four (4) month period over this 7 year period.

HHS-R&L suspects that bio film growth in your distribution system may be the cause of these positive bacteriological samples. In an attempt to avoid future coliform violations, HHS-R&L strongly recommends the Village of Axtell implement maintenance disinfection for your water distribution system, just ahead of the 4 month period in which the positive samples are showing up. The 4 month period identified for your system is September through December.

Maintenance disinfection needs to be recorded and reported to HHS-R&L according to Title 179 NAC 16 Attachment 1 item C, Disinfectants and Disinfection By-Products Rule. Your system would also be required to do Total Organic Carbon (TOC) monitoring from each water source (well). As long as the TOC levels for every source are at or less than 2.0 mg/l, and maintenance disinfection is applied for no more than 21 consecutive or 30 cumulative calendar days, your system will not have to sample for Disinfection By-Products.

You need to be aware that if the trend of positive bacteriological samples continues the Village of Axtell may become a candidate for permanent continuous disinfection. HHS-R&L strongly encourages you to be pro-active and address this problem on your own, and avoid permanent disinfection.

If you have any questions, you may contact HHS-R&L staff person Doug Woodbeck, who is closest to this issue, at your convenience by E-mail at [doug.woodbeck@hhs.state.ne.us](mailto:doug.woodbeck@hhs.state.ne.us), by phone at (402) 471-0521 or at the address on this letterhead. You may also contact me by E-mail at [jack.daniel@hhs.state.ne.us](mailto:jack.daniel@hhs.state.ne.us) or by phone at (402) 471-0510.

Sincerely,

Jack Daniel  
HHS-R&L Environmental Health Services Administrator

Xc: PWS File  
Ralph Naber, HHS-R&L Field Representative  
Doug Woodbeck, HHS-R&L Field Services Program Manager  
Howard Isaacs, HHS-R&L Monitoring and Compliance Program Manager  
Subhash Jha, HHS-R&L Engineering Services Program Manager  
Barney Whatley, Nebraska Rural Water Association  
Tim Rutledge, Midwest Assistance Program  
Rob Pierce, League of Nebraska Municipalities